

# EXHIBIT A

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*Attorneys for Plaintiff(s)*

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AILENE CABRERA,

*Plaintiff,*

v.

SANOFI S.A.;  
AVENTIS PHARMA S.A.;  
SANOFI U.S. SERVICES INC.,  
formerly known as SANOFI-AVENTIS  
U.S. INC.;  
SANOFI-AVENTIS U.S. LLC,  
separately and doing business as  
WINTHROP U.S.;  
SANDOZ, INC.;  
HOSPIRA, INC.;  
HOSPIRA WORLDWIDE, LLC formerly  
known as HOSPIRA WORLDWIDE, INC.;  
ACCORD HEALTHCARE, INC.;  
MCKESSON CORPORATION doing  
business as MCKESSON PACKAGING;  
SUN PHARMA GLOBAL FZE;  
SUN PHARMACEUTICAL INDUSTRIES,  
INC. formerly known as CARACO  
PHARMACEUTICAL LABORATORIES,  
LTD.;  
ACTAVIS LLC formerly known as  
ACTAVIS INC.;  
ACTAVIS PHARMA, INC.;  
PFIZER, INC.;  
SAGENT PHARMACEUTICALS INC.;  
AND  
JOHN DOE DRUG COMPANY  
DEFENDANTS #1-10,

*Defendants.*

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION: MIDDLESEX COUNTY

:  
: CASE TYPE: MCL NO. 628

:  
: MASTER DOCKET NO.  
: MID-L-4998-18-CM

:  
: DOCKET NO. MID-L-\_\_\_\_\_

:  
: **CIVIL ACTION**  
: **IN RE TAXOTERE LITIGATION**

:  
: **THIRD AMENDED MASTER SHORT**  
: **FORM COMPLAINT**  
: **& JURY DEMAND**

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Plaintiff, AILENE CABRERA, complaining against the Defendants, allege as follows:

1. Pursuant to the Master Pleading Implementation Order, entered in the In Re Taxotere Litigation, Master Case No. MID-L-4998-18-CM, Case No. 628, the undersigned counsel hereby submit this Third Amended Master Short Form Complaint and Jury Demand against the Defendants. Plaintiff hereby adopts and incorporates by reference the Third Amended Master Long Form Complaint and Jury Demand filed in the above-referenced case. This Master Short Form Complaint adopts allegations and encompasses claims as well as any amendments as set forth in the Third Amended Master Long Form Complaint against Defendant(s) by reference.

Plaintiff further alleges as follows:

2. Plaintiff:  
AILENE CABRERA
3. Spousal Plaintiff or other party making loss of independent/secondary claim (i.e., loss of consortium):  
N/A
4. Other type of Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):  
N/A
5. Current State of Residence: Florida
6. State in which Plaintiff alleges injury: Florida
7. Defendants (check all Defendants against whom a Complaint is made):
  - a. Taxotere Brand Name Defendants:

☒ A. Sanofi U.S. Services Inc., formerly known as Sanofi-Aventis U.S. Inc.

- ☒ B. Sanofi-Aventis U.S. LLC separately and doing business as Winthrop U.S.
- ☐ C. Sanofi S.A.
- ☐ D. Aventis Pharma S.A.
- b. Other Brand Name Drug Sponsors, Manufacturers, Distributors, and John Doe Defendants:
- ☒ A. Winthrop U.S.
- ☒ B. Sandoz, Inc.
- ☒ C. Accord Healthcare, Inc.
- ☒ D. McKesson Corporation doing business as McKesson Packaging
- ☒ E. Hospira Worldwide, LLC formerly known as Hospira Worldwide, Inc.
- ☒ F. Hospira, Inc.
- ☐ G. Sun Pharma Global FZE
- ☒ H. Sun Pharmaceutical Industries, Inc. formerly known as Caraco Pharmaceutical Laboratories, Ltd.
- ☐ I. Pfizer, Inc.
- ☐ J. Actavis LLC formerly known as Actavis Inc.
- ☐ K. Actavis Pharma, Inc.
- ☐ L. Sagent Pharmaceuticals, Inc.
- ☒ M. John Doe Drug Company Defendants #1-10, who are persons, individuals, and/or entities who are liable and/or responsible for Plaintiff's/Plaintiffs' damages, but who have not been identified.
- ☐ N. Other: \_\_\_\_\_

Basis for Jurisdiction:

- A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 9-148.

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B. Other allegations of jurisdiction and venue:

N/A

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8. Brand Product(s) used by Plaintiff (check applicable):

☐ A. Taxotere

☐ B. Docefrez

☐ C. Docetaxel Injection

☐ D. Docetaxel Injection Concentrate

☒ E. Unknown

☐ F. Other: \_\_\_\_\_

9. First date and last date of use (or approximate date range, if specific dates are unknown) for Products identified in question 8:

1/22/2013 and 3/26/2013, approximate.

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10. State in which Product(s) identified in question 8 was/were administered:

Florida

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11. Nature and extent of alleged injury (including duration, approximate date of onset (if known), and description of alleged injury):

EXTENSIVE ALOPECIA, DOES NOT CURRENTLY RECALL DATE OF ONSET,  
UNTIL PRESENT.

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12. Counts in Master Complaint brought by Plaintiff:

- ☒ Count I – Failure to Warn Under New Jersey Products Liability Act
- ☒ Count II – Strict Products Liability – Design and Manufacturing Under New Jersey Products Liability Act
- ☒ Count III – Breach of Express Warranty – Sanofi S.A., Aventis Pharma S.A., Sanofi U.S. Services Inc., formerly known as Sanofi-Aventis U.S. Inc., and Sanofi-Aventis U.S. LLC, separately and doing business as Winthrop US
- ☒ Count IV – Breach of Express Warranty – Sandoz, Inc.
- ☒ Count V – Breach of Express Warranty – Hospira, Inc., and Hospira Worldwide, LLC formerly known as Hospira Worldwide, Inc.
- ☒ Count VI – Breach of Express Warranty – Accord Healthcare, Inc. and McKesson Corporation doing business as McKesson Packaging
- ☒ Count VII – Breach of Express Warranty – Sun Pharma Global FZE and Sun Pharmaceutical Industries, Inc. formerly known as Caraco Pharmaceutical Laboratories, Ltd
- ☐ Count VIII – Breach of Express Warranty – Actavis Pharma, Inc.; Actavis LLC formerly known as Actavis Inc.; and Sagent Pharmaceuticals, Inc.

- ☐ Count IX – Breach of Express Warranty – Pfizer, Inc.
- ☐ Count X – Loss of Consortium
- ☐ Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting “Other” and setting forth such claims below. If Plaintiff(s) includes additional theories of recovery, the specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail.
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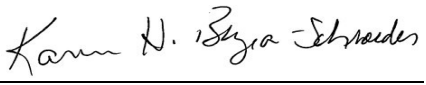
- ☒ Jury Trial is Demanded as to All Counts
- ☐ Jury Trial is NOT Demanded as to Any Count

13. Plaintiff has suffered and will continue to suffer pain, suffering, disability, impairment, loss of enjoyment of life, inability to engage in chosen and necessary activities, and/or economic damages, as a result of the administration of the designated product(s).

WHEREFORE, Plaintiff(s) demand(s) Judgment against the Defendants awarding compensatory damages, attorney’s fees, interest, costs of suit and such further relief as the Court deems equitable and just.

Dated: May 27, 2020

**BURNETT LAW FIRM**

By:   
Karen Beyea-Schroeder, Esq.  
NJ Bar No.023131997  
3737 Buffalo Speedway, Ste. 1850  
Houston, TX 77098  
Tel: (832) 413-4410  
Fax: (832) 900-2120  
Karen.Schroeder@RBurnettLaw.com  
*Attorneys for Plaintiff(s)*

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to New Jersey Court Rule 4:25-4, KAREN BEYEA-SCHROEDER is hereby designated as trial counsel.

By: Karen H. Beyea Schroeder  
Karen Beyea-Schroeder, Esq.  
NJ Bar No.023131997  
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**RULE 4:5-1 CERTIFICATION**

I hereby certify that to the best of my knowledge the matter in controversy is the subject of numerous other actions filed in the Superior Court, all of which are consolidated and designated as and under Master Docket No. MID-L-4998-18-CM, and that no other parties are necessary to join at this time.



I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: May 27, 2020

**BURNETT LAW FIRM**

By: Karen H. Beyea-Schroeder  
Karen Beyea-Schroeder, Esq.  
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*Attorneys for Plaintiff(s)*

**Appendix XII-B1**

 <b>CIVIL CASE INFORMATION STATEMENT (CIS)</b> Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 <b>Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</b>		FOR USE BY CLERK'S OFFICE ONLY	
		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
		CHG/CK NO.	
		AMOUNT:	
		OVERPAYMENT:	
		BATCH NUMBER:	
ATTORNEY / PRO SE NAME Karen Beyea-Schroeder		TELEPHONE NUMBER (832) 413-4410	COUNTY OF VENUE Middlesex
FIRM NAME (if applicable) Burnett Law Firm		DOCKET NUMBER (when available)	
OFFICE ADDRESS 3737 Buffalo Speedway Suite 1850 Houston, TX 77098		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Ailene Cabrera, Plaintiff		CAPTION AILENE CABRERA v. SANOFI U.S. SERVICES INC., formerly known as SANOFI-AVENTIS U.S. INC.; et al.	
CASE TYPE NUMBER (See reverse side for listing) 606	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS see below	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN	
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION This is a pharmaceutical defect case against NJ-based companies for which there is an MCL before Judge Hyland.			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
<b>I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule</i> 1:38-7(b).</b>			
ATTORNEY SIGNATURE: <i>Karen N. Beyea-Schroeder</i>			

**Side 2**

# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1***CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE – PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE – PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT – OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Multicounty Litigation (Track IV)**

- |  |   |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN                  | 292 PELVIC MESH/BARD                                      |
| 274 RISPERDAL/SEROQUEL/ZYPREXA             | 293 DEPUY ASR HIP IMPLANT LITIGATION                      |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL     | 295 ALLODERM REGENERATIVE TISSUE MATRIX                   |
| 282 FOSAMAX                                | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS           | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 286 LEVAQUIN                               | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR              |
| 287 YAZ/YASMIN/OCELLA                      | 300 TALC-BASED BODY POWDERS                               |
| 289 REGLAN                                 | 601 ASBESTOS  |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA  |
| 291 PELVIC MESH/GYNECARE                   | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS                   |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

# Civil Case Information Statement

## Case Details: MIDDLESEX | Civil Part Docket# L-003160-20

**Case Caption:** CABRERA AILENE VS SANOFI U.S. SERVICES , INC.

**Case Initiation Date:** 05/27/2020

**Attorney Name:** KAREN HOPE BEYEA-SCHROEDER

**Firm Name:** SCHROEDER LAW OFFICE, PLLC

**Address:** PO BOX 131747

THE WOODLANDS TX 77393

**Phone:** 8325859829

**Name of Party:** PLAINTIFF : Cabrera, Ailene

**Name of Defendant's Primary Insurance Company**  
(if known): Unknown

**Case Type:** TAXOTERE/DOCETAXEL

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 12 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by: Ailene Cabrera?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

05/27/2020

Dated

/s/ KAREN HOPE BEYEA-SCHROEDER

Signed